

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

FRONTIER COMMUNICATIONS CORP., *et al.*,
Reorganized Debtors.

Chapter 11

Case No. 20-22476 (MG)

(Jointly Administered)

ORDER COMPELLING PRODUCTION

On direction of this Court during a discovery conference on December 11, 2024, Frontier produced 157 documents for *in camera* review. These documents pertain to the creation of a spreadsheet which Frontier described at that December 11 conference as a definitive list of approximately 441 Frontier accountholders who were terminated because of DMCA violations. (ECF Doc. # 2474 (“Transcript”) at 21:5–22:5.) This spreadsheet was created in response to the Record Company Claimants’ requests for information concerning the accounts Frontier terminated pursuant to its repeat-infringement policy. (ECF Doc. # 2402.) Frontier agreed that it is precluded from offering any evidence of terminations on account of DMCA violations for any subscribers outside the 441 listed in the spreadsheet.¹ (*Id.* 26:4–30:17.) Counsel for the Record Company Claimants stated during the December 11 hearing that they had requested “all the documentation relating to the creation of this termination list” (the spreadsheet), and that Frontier had asserted work product privilege over it. (Transcript at 33:5–17.) The Court subsequently ordered Frontier to produce these documents to the Court for *in camera* review, along with an updated privilege log including these documents. (*Id.* at 33:12–34:13.)

¹ It has since come to light that not all of the customers identified on the spreadsheet were terminated because they violated the DMCA. (*See* ECF Doc. # 2488.)

In a letter to this Court accompanying the production of the 157 documents, Frontier describes the spreadsheet as a document “which lists subscribers who (1) received termination letters and (2) for whom Frontier identified an account termination or data disconnect date in its DPI system.” (ECF Doc. # 2476.) Frontier claims that because the spreadsheet was “created at the direction of counsel *during and for* this litigation . . . the documents surrounding its creation are protected by the work product doctrine.” (*Id.*) Frontier also asserts attorney-client privilege over the communications the company had with its outside counsel which concern the creation of this spreadsheet. Frontier specifies the privilege or protection it is asserting over specific documents in its updated privilege log.

The Court sustains in part and overrules in part Frontier’s privilege claims. The attorney-client privilege applies to those communications Frontier had with its outside counsel which it submitted for *in camera* review. *See In re Omnicom Grp., Inc. Sec. Litig.*, 233 F.R.D. 400, 404 (S.D.N.Y. 2006) (“The privilege covers communications between the client (or the client’s representative) and his attorney (or the attorney’s representative) that are maintained in confidence and that are undertaken to facilitate or request the rendition of legal advice or the performance of other legal services by the attorney or that constitute the communication of such advice by the attorney.”). Many of the emails between Frontier and its outside counsel also constitute opinion work product, as they contain “mental impressions, conclusions, opinions, or legal theories” of Frontier’s outside counsel regarding aspects of Frontier’s defense and the creation of the spreadsheet. *United States v. Adlman*, 134 F.3d 1194, 1197 (2d Cir.1998). However, none of the other documents are privileged.

The other documents largely fall into several categories: account termination letters sent to Frontier customers, drafts of (portions of) the spreadsheet, Teams meeting invitations,

computer script used to generate the spreadsheet, and Teams and email communications between Frontier employees. For the reasons discussed in the below chart, none of these types of documents are privileged. To the extent that any of these documents constitute fact work product (specifically, the drafts of the spreadsheet), Frontier waived privilege over fact work product related to the “matter” of the spreadsheet when it sent the spreadsheet—itsself a piece of work product—to the plaintiffs in this case. *See Carpenter v. Churchville Greene Homeowner’s Ass’n*, No. 09-CV-6552T, 2011 WL 4711961, at *10 (W.D.N.Y. Sept. 29, 2011), *report and recommendation adopted sub nom. Carpenter v. Churchville Greene Homeowner’s Ass’n, Inc.*, No. 09-CV-6552, 2011 WL 6012539 (W.D.N.Y. Dec. 1, 2011) (“Disclosure to an adversary of work product protected material will generally effect a waiver.”); *United States v. Nobles*, 422 U.S. 225, 239 (1975) (concluding that the testimonial use of work product constitutes waiver of all work product concerning the same subject matter); *Matrix Essentials, Inc. v. Quality King Distributors, Inc.*, No. CV901070LDWWDW, 2006 WL 8435312, at *4–5 (E.D.N.Y. Jan. 12, 2006) (finding waiver of fact work product related to a disclosed document, but not of opinion work product; “a waiver of work product by disclosure waives the privilege only as to matters covered in the waived documents”) (cleaned up); *BNP Paribas v. Bank of New York Tr. Co.*, No. 11 CIV. 350 PGG HBP, 2013 WL 2434686, at *7 (S.D.N.Y. June 5, 2013) (same). Frontier did not, however, waive privilege over *opinion* work product related to the spreadsheet. *See Matrix Essentials*, 2006 WL 8435312, at *4–5 (finding waiver of fact, but not opinion, work product); *see also Palazzetti Imp./Exp., Inc. v. Morson*, No. 98-cv-722, 2000 WL 1015921, at *3 (S.D.N.Y. July 21, 2000) (“Although both factual and opinion work product fall within the scope of the doctrine, an attorney’s mental impressions, conclusions, opinions, or legal theories typically are afforded greater protection.”). Upon review of the documents, the Court has found

that (with the exception of one, PRIV00001931), the documents that are *not* communications between Frontier and its outside counsel and do *not* constitute or contain opinion work product, as none reflect the “mental impressions, conclusions, opinions, or legal theories of an attorney.”

In re Grand Jury Proceedings, 219 F.3d 175, 190 (2d Cir. 2000).

The below chart contains the Court’s document-by-document rulings and associated orders. The chart also reflects the assertions of privilege Frontier made over each document in its privilege log. WP stands for “work product,” and AC stands for “attorney-client.”

Frontier is hereby **ORDERED** to produce to the plaintiffs the documents indicated in the chart for production.

BATES (PRIV0000-)	PRIVILEGE ASSERTED	PRIVILEGED (WP or AC)?	ORDER
1887	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce
1888	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce
1889	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce
1890	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce
1891	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce
1892	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce
1893	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce
1894	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce
1895	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1896	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1897	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1898	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1899	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1900	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.

1901	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1902	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1903	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1904	WP	NOT PRIVILEGED (explanation of why two individuals were removed from DMCA termination list; not evidently created in anticipation of litigation)	Produce. Redact PII.
1905	WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
1906	WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
1907	WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
1908	WP	NOT PRIVILEGED (does not concern the creation of the spreadsheet, was not created in anticipation of litigation)	Produce. Redact PII.
1909	WP	NOT PRIVILEGED. <i>See</i> ECF Doc. # 2462	Produce, but redact the last sentence of

		(ordering production of litigation hold notices)	the second paragraph.
1910	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1911	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1912	WP	NOT PRIVILEGED (Teams chat is not fact work product; does not contain hallmarks of opinion work product such as attorney mental impressions)	Produce.
1913	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1914	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1915	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1916	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1917	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1918	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1919	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1920	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.

1921	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1922	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1923	AC, WP	PRIVILEGED IN PART (communications do not entirely concern the provision of legal advice, do not contain hallmarks of opinion work product such as attorney mental impressions; not fact work product)	Produce, but redact Sean Murphy’s May 13, 2024 email after “Please include.”
1924	WP	NOT PRIVILEGED (not obviously created in anticipation of litigation)	Produce.
1925	WP	NOT PRIVILEGED (not obviously created in anticipation of litigation)	Produce.
1926	WP	NOT PRIVILEGED (not obviously created in anticipation of litigation)	Produce.
1927	WP	PRIVILEGED (while Frontier does not claim AC privilege over this attorney-client communication, the May 16, 2024 email from Frontier’s outside counsel is opinion work product)	Do not produce.
1928	WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
1929	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.

1930	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1931	WP	PRIVILEGED (includes opinion work product from attorneys)	Do not produce.
1932	WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
1933	WP	NOT PRIVILEGED (Teams chat is not fact work product; does not contain hallmarks of opinion work product such as attorney mental impressions)	Produce.
1934	WP	NOT PRIVILEGED (Teams chat is not fact work product; does not contain hallmarks of opinion work product such as attorney mental impressions)	Produce.
1935	WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1936	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1937	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1938	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1939	WP	NOT PRIVILEGED (Teams chat is not fact work product; does not contain hallmarks of opinion work product such as attorney mental impressions)	Produce.

1940	WP	NOT PRIVILEGED (Teams chat is not fact work product; does not contain hallmarks of opinion work product such as attorney mental impressions)	Produce.
1941	WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1942	WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
1943	WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1944	AC, WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
1945	WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1946	WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
1947	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1948	AC, WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP	Do not produce.

		privilege was waived via the production of the spreadsheet to the RCCs)	
1949	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1950	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1951	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1952	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1953	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1954	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1955	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1956	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1957	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1958	AC, WP	PRIVILEGED IN PART (attorney-client communication)	Produce, but redact portion of Christopher Klimmek’s May 30, 2024 email from “to discuss” to the end of the sentence.
1959	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.

1960	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1961	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1962	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1963	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1964	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce.
1965	AC, WP	NOT PRIVILEGED (no communication, no work product – just a Teams meeting invitation)	Produce
1966	AC, WP	PRIVILEGED IN PART (communication with outside counsel)	Produce, but redact portion of Christopher Klimmek’s May 30, 2024 email from “to discuss” to the end of the sentence.
1967	AC, WP	PRIVILEGED IN PART (communication with outside counsel)	Produce, but redact body of Sean Murphy’s May 30, 2024 email.
1968	AC, WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
1969	AC, WP	PRIVILEGED (communication with outside counsel)	Produce, but redact body of Sean Murphy’s May 30, 2024 email and body

			of Christopher Klimmek's June 3, 2024 email.
1970	[JUNK]	[N/A]	[N/A]
1971	AC, WP	PRIVILEGED (communication with outside counsel)	Produce, but redact body of Sean Murphy's May 30, 2024 email and body of Christopher Klimmek's June 3, 2024 email.
1972	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
1973	AC, WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
1974	WP	PRIVILEGED (communication with outside counsel)	Produce, but redact body of Sean Murphy's May 30, 2024 email and body of Christopher Klimmek's June 3, 2024 email.
1975	WP	NOT PRIVILEGED (copies of termination letter sent to subscriber)	Produce. Redact PII.
1976	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1977	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1978	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1979	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1980	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.

1981	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1982	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1983	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1984	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1985	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1986	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1987	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1988	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1989	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1990	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1991	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1992	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1993	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1994	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1995	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.

1996	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1997	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1998	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
1999	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
2000	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
2001	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
2002	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
2003	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
2004	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
2005	WP	NOT PRIVILEGED (copy of termination letter sent to subscriber)	Produce. Redact PII.
2006	WP	PRIVILEGED (communication with outside counsel)	Produce, but redact body of Sean Murphy's May 30, 2024 email and body of Christopher Klimmek's June 3, 2024 email.
2007	[JUNK]	[N/A]	[N/A]
2008	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2009	WP	NOT PRIVILEGED (Teams chat is not fact work product; does not contain hallmarks of opinion work product	Produce.

		such as attorney mental impressions)	
2010	WP	NOT PRIVILEGED (Teams chat is not fact work product; does not contain hallmarks of opinion work product such as attorney mental impressions)	Produce.
2011	WP	NOT PRIVILEGED (Teams chat is not fact work product; does not contain hallmarks of opinion work product such as attorney mental impressions)	Produce.
2012	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2013	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2014	AC, WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
2015	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2016	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2017	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2018	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2019	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.

2020	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2021	AC, WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
2022	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2023	WP	NOT PRIVILEGED (Teams chat is not fact work product; does not contain hallmarks of opinion work product such as attorney mental impressions)	Produce.
2024	WP	NOT PRIVILEGED (computer script is not opinion work product as it does not contain mental impressions; to the extent it may qualify as fact work product, privilege waived via disclosure of spreadsheet)	Produce.
2025	WP	NOT PRIVILEGED (computer script is not opinion work product as it does not contain mental impressions; to the extent it may qualify as fact work product, privilege waived via disclosure of spreadsheet)	Produce.
2026	WP	NOT PRIVILEGED (computer script is not opinion work product as it does not contain mental impressions; to the extent it may qualify	Produce.

		as fact work product, privilege waived via disclosure of spreadsheet)	
2027	WP	NOT PRIVILEGED (computer script is not opinion work product as it does not contain mental impressions; to the extent it may qualify as fact work product, privilege waived via disclosure of spreadsheet)	Produce.
2028	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2029	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2030	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2031	AC, WP	NOT PRIVILEGED (Teams chat is not fact work product; does not contain hallmarks of opinion work product such as attorney mental impressions)	Produce.
2032	WP	NOT PRIVILEGED (computer script is not opinion work product as it does not contain mental impressions; to the extent it may qualify as fact work product, privilege waived via disclosure of spreadsheet)	Produce.
2033	WP	NOT PRIVILEGED (computer script is not opinion work product as it does not contain mental impressions; to the extent it may qualify	Produce.

		as fact work product, privilege waived via disclosure of spreadsheet)	
2034	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2035	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2036	AC, WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
2037	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2038	AC, WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
2039	WP	NOT PRIVILEGED (email is not fact work product; does not contain hallmarks of opinion work product; no counsel on the email)	Produce.
2040	WP	NOT PRIVILEGED (draft of portion of spreadsheet; any WP privilege was waived via the production of the spreadsheet to the RCCs)	Produce. Redact PII.
2041	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
2042	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.

2043	AC, WP	PRIVILEGED (communication with outside counsel)	Do not produce.
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IT IS SO ORDERED.

Dated: December 27, 2024
New York, New York

/s/ Martin Glenn
MARTIN GLENN
Chief United States Bankruptcy Judge